

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
EVANSVILLE DIVISION

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UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) CAUSE NO. 3:08-cr-0013-RLY-WGH-01
)
THOMAS PERKINS,)
)
Defendant.)

STIPULATED FACTUAL BASIS OF THE PARTIES

Comes now the United States of America, by counsel, Bradley A. Blackington, Assistant United States Attorney, and the defendant, Thomas Perkins, by counsel, Brian P. Butler and Keith E. Kamenish, and file this Stipulated Factual Basis of the Parties:

From May 22, 2007 through August 22, 2007, DEA conducted wire surveillance over telephone number (812) 454-5148 ("Target Phone I"). From July 24, 2007 through August 22, 2007, DEA conducted wire surveillance over telephone number (812) 287-2882 ("Target Phone V"). Target Phone I and Target Phone V were cellular telephones used by David Neighbors.

The wire surveillance, coupled with statements from some of Neighbors' accomplices, revealed the existence of a cocaine trafficking organization that operated in Evansville from May, 2007 through August, 2007. David Neighbors, a resident of Evansville and Henderson, Kentucky, directed the activities of the organization. Neighbors, accompanied by other individuals, traveled from Evansville to Louisville, Kentucky to obtain the cocaine from Thomas Perkins. Other individuals who traveled from Evansville to Louisville with Neighbors included Antonio Miles, Keshawn Horne, and Lafrederick Taylor.

Neighbors distributed the cocaine to his customers in Evansville, who included Lafrederick Taylor, Derrick Stanfield, Kamal Sims, Jason Kirk, Trevor Perry, Dimitrai Cabell, Jason Horne, and Maurice Nicholson.

The wire surveillance revealed that Neighbors obtained cocaine from Perkins in Louisville on ten occasions, on the dates and in the amounts described in the following table:

Trip#	Date	Amount of Cocaine
1	5/30/07	9 ounces of crack
2	5/31/07	9 ounces of crack
3	6/5/07	18 ounces of crack
4	6/7/07	Unascertained amount of cocaine
5	6/10/07	9-18 ounces of crack 9-18 ounces of powder
6	6/14/07	Unascertained amount of cocaine
7	7/8/07	13.5 ounces of crack 13.5 ounces of powder
8	7/29/07	13.5 ounces of crack 9 ounces of powder
9	8/2/07	13.5 ounces of crack 9 ounces of powder
10	8/10/07	9 ounces of crack

Perkins delivered at least 94.5 ounces of crack cocaine and 40.5 ounces of powder cocaine to Neighbors.

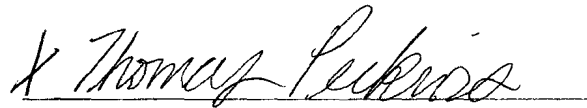
The parties agree that the facts outlined above are true and correct to the best of their knowledge, information, and belief. The parties further agree that these facts constitute a sufficient factual basis to support the defendant's plea of guilty.

Respectfully submitted,

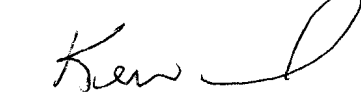
TIMOTHY M. MORRISON
United States Attorney

By:


Bradley A. Blackington
Assistant United States Attorney


Thomas Perkins
Defendant

Brian P. Butler
Attorney for James Brown


Keith E. Kamenish
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